

**UNITED STATES DISTRICT COURT
NORTHERN DISTRICT OF ILLINOIS**

YOZONS, INC.,

Plaintiff,

v.

Case No. 14-CV-7804

JURY TRIAL DEMANDED

SERTIFI INC.,

Defendant.

COMPLAINT

YOZONS, INC. (“Yozons”) by and through its undersigned attorneys Hansen Reynolds Dickinson Crueger LLC, hereby files this complaint for patent infringement against SERTIFI INC. (“Sertifi”) and alleges as follows:

THE PARTIES

1. Yozons is a corporation organized under the laws of the State of Washington having its principal place of business located at 218 Main Street, Suite 632, Kirkland, Washington 98033-6108. Yozons provides customers with electronic signature and e-contracting services.

2. Upon information and belief, Sertifi is a corporation organized under the laws of the State of Illinois having its principal place of business at 350 N. LaSalle Street Suite 1020, Chicago, IL 60654. Sertifi provides customers with electronic signature and e-contracting services and is a direct competitor of Yozons.

JURISDICTION AND VENUE

3. This is an action for patent infringement under the patent laws of the United States, 35 U.S.C. §§ 271, *et seq.*

4. This Court has jurisdiction over the subject matter of this patent infringement action

pursuant to 28 U.S.C. §§ 1331 and 1338(a).

5. This Court has personal jurisdiction over Sertifi because Sertifi is headquartered and has done substantial business in this district and has committed acts of patent infringement within the State of Illinois giving rise to this action.

6. Venue is proper in this judicial district pursuant to 28 U.S.C. §§ 1391(a), 1391(b), 1391(c) and 1400(b) for at least the reasons that Sertifi has committed acts within this judicial district giving rise to this action and does business in this district, including sales, offers for sale, and providing service and/or support to its customers in this district.

COUNT I

Patent Infringement of United States Patent No. 7,360,079

7. Paragraphs 1 through 6 are incorporated by reference as if fully set forth herein.

8. United States Patent No. 7,360,079 is titled “System and method for processing digital documents utilizing secure communications over a network.” United States Patent No. 7,360,079 was issued on April 15, 2008. A true and correct copy of United States Patent No. 7,360,079 is attached as Exhibit A.

9. Yozons is the lawful assignee of the entire right, title and interest in and to U.S. Patent No. 7,360,079 and possesses all rights of recovery under the patent including the right to recover damages for past infringement.

10. Upon information and belief, Sertifi has been and is now making, using, selling, and offering for sale within the United States a system or method for electronic signature and e-contracting that infringes directly and/or indirectly at least claim 5 of U.S. Patent No. 7,360,079.

11. Yozons has no adequate remedy at law against Sertifi’s acts of infringement and will suffer irreparable harm unless Sertifi is permanently enjoined from its infringement of U.S. Patent No. 7,360,079.

13. Sertifi, by way of its infringing activity, has caused and continues to cause Yozons to suffer damages in an amount to be determined at trial.

PRAYER FOR RELIEF

Wherefore, Yozons prays for judgment against Sertifi, granting Yozons the following relief:

- A. That this Court adjudge and decree that Sertifi has infringed and continues to infringe one or more claims of U.S. Patent No. 7,360,079;
- B. That this Court grant injunctions enjoining the aforesaid acts of infringement by Sertifi, its officers, agents, servants, employees, subsidiaries and attorneys, and those acting in concert with it, including related individuals and entities, customers, representatives, OEMs, dealers, and distributors;
- C. That this Court enter an award to Yozons of such damages as it shall prove at trial against Sertifi that are adequate to compensate Yozons for said infringement as permitted under the Patent Act;
- D. That this Court award Yozons any profits that Yozons lost due to Sertifi's infringement of U.S. Patent No. 7,360,079.
- E. That this Court award Yozons pre-judgment and post-judgment interests on damages; and
- F. That this Court grant to Yozons such other, further, and different relief as may be just and proper.

JURY TRIAL DEMAND

Yozons respectfully demands a trial by jury of any and all issues triable of right before a jury pursuant to Fed. R. Civ. P. 38.

Dated October 6, 2014

Hansen Reynolds Dickinson Crueger LLC

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